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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION	Master Docket No. 3:12-CV-01893-MAS-TJB
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**NOTICE OF PLAINTIFFS' MOTION TO AUTHORIZE  
CY PRES DISTRIBUTION OF REMAINING SETTLEMENT  
FUND, OR, IN THE ALTERNATIVE, FOR A SECOND  
DISTRIBUTION OF SETTLEMENT FUND**

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**TO: ALL COUNSEL IN THE CAPTIONED MATTER**

**PLEASE TAKE NOTICE** that on July 6, 2020 at 9:00 am, or as soon thereafter as counsel may be heard, Plaintiffs will move before the Honorable Michael A. Shipp, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an order authorizing Plaintiffs to have the

Court-appointed claims administrator—Gilardi & Co, LLC (“Gilardi”)—distribute the remaining amount from the Settlement Fund *cy pres* to the following four organizations, divided evenly: 1) Risklink.org; 2) the New Jersey Citizen Action Fund; 3) the Public Justice Foundation; and 4) Legal Services of New Jersey—Campaign for Justice, as well as authorizing a payment of \$177,402.35 to Gilardi for the work Gilardi performed as claims administrator in this matter. In the alternative, Plaintiffs will move for an order to allow Gilardi to issue a second distribution of the remaining Settlement Fund to Settlement Class members that filed valid claims, along with authorizing a payment of \$177,402.35 to Gilardi for the work Gilardi performed as claims administrator in this matter.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and the Third Supplemental Declaration of Kenneth Jue on Behalf of the Settlement Administrator. A proposed form of Order is also submitted herewith.

**LITE DEPALMA GREENBERG, LLC**

Dated: June 4, 2020

/s/ Bruce D. Greenberg

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